

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>NEW HAMPSHIRE INSURANCE COMPANY, )</b>	)	
<b>Plaintiff, )</b>	)	
<b>-vs- )</b>	)	<b>NO. 08 CV 1326</b>
<b>GREEN DRAGON TRADING COMPANY, )</b>	)	<b>JUDGE DER-YEGHIAYAN</b>
<b>c/o Dombrowski &amp; Sorensen Attorneys at Law, )</b>	)	<b>MAG. JUDGE KEYS</b>
<b>Defendant. )</b>	)	

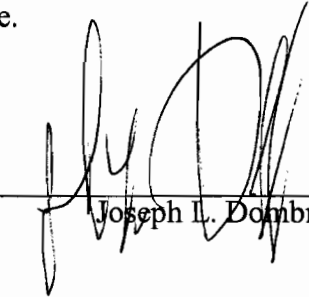
**AFFIDAVIT OF JOSEPH L. DOMBROWSKI**

Joseph L. Dombrowski, on oath, states:

1. I make this Affidavit of my own personal knowledge, and am competent to testify to the matters stated in this Affidavit.
2. I practice law at Chicago. My law office address is the place to which New Hampshire Insurance Company sends premium notices. I am not the registered agent for Green Dragon Trading Company ("Green Dragon"). Green Dragon does not have a registered agent in Illinois.
3. The matters of fact alleged in the Motion to which this Affidavit is attached are true.
4. The M/V Le Viper is being repaired in Ft. Lauderdale, Florida. It will be surveyed upon the completion of repairs, and that survey will occur in Florida, at Ft. Lauderdale. Le Viper was built in Louisiana.
5. I do not know of any Illinois resident who is, or could be, a witness to the events encompassing the distress and towing of M/V Le Viper. I do not know of any person in Illinois who might or could be called as a witness in the case. The case will involve expert witnesses on both sides; all of the experts of which I have any knowledge will be Floridians. If I am required to be a witness, I will be available in Florida. I spend much of each year in Florida.

6. I know that it would be expensive to produce the witnesses to this case at Chicago. It would be most inconvenient to litigate this case at such a distance from the place where everything occurred and where all of the witnesses reside.

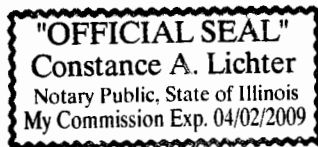
Further, Affiant sayeth not

  
\_\_\_\_\_  
Joseph L. Dombrowski

SUBSCRIBED and SWORN TO

before me this 3rd day of April, 2008.

  
\_\_\_\_\_  
Notary Public



**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**NEW HAMPSHIRE INSURANCE COMPANY, )**

**Plaintiff, )**

**-vs- )**

**GREEN DRAGON TRADING COMPANY, )  
c/o Dombrowski & Sorensen Attorneys at Law, )**

**Defendant. )**

**NO. 08 CV 1326**

**JUDGE DER-YEGHIAYAN**

**MAG. JUDGE KEYS**

**NOTICE OF MOTION**

To: SEE ATTACHED SERVICE LIST

YOU ARE HEREBY NOTIFIED that on Wednesday, April 9, 2008 at 9:00 a.m. or as soon thereafter as Counsel may be heard, we shall appear before the Honorable Samuel Der-Yeghiayan, or any judge sitting in his stead, in Courtroom 1903 usually occupied by him in the United States District Court, Northern District of Illinois - Eastern Division, 219 South Dearborn Street, Chicago, Illinois 60604, and then and there present our **MOTION TO DISMISS FOR LACK OF VENUE OR, IN THE ALTERNATIVE, TO TRANSFER**, for Defendant, Green Dragon Trading Company, a copy of which has been electronically filed with the Clerk, at which time and place you may appear if you see fit to do so.

Respectfully submitted,

BY: s/s George B. Collins  
Attorney for Defendant,  
Green Dragon Trading Company

George B. Collins  
Collins, Bargione & Vuckovich  
One North LaSalle St.  
Chicago, IL 60602  
(312) 372-7813

**CERTIFICATE OF SERVICE**

George B. Collins hereby certifies that on Thursday, April 3, 2008, he caused this **NOTICE OF MOTION/CERTIFICATE OF SERVICE** and the **MOTION TO DISMISS FOR LACK OF VENUE OR, IN THE ALTERNATIVE, TO TRANSFER**, to be served on the parties of record listed on the attached Service List, electronically by operation of the Court's electronic filing system, by filing the document electronically with the Clerk of this Court.

BY: s/s George B. Collins  
Attorneys for Defendant,  
Green Dragon Trading Company

**SERVICE LIST**

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